IN THE DRAWINGS

Please replace Drawing Sheet 1, including Fig. 1, with the attached Replacement Sheet, including amended Fig. 1.

Please replace Drawing Sheet 2, including Fig. 2, with the attached Replacement Sheet, including amended Fig. 2.

Please replace Drawing Sheet 4, including Fig. 4, with the attached Replacement Sheet, including amended Fig. 4.

Please replace Drawing Sheet 5, including Fig. 5, with the attached Replacement Sheet, including amended Fig. 5.

Please replace Drawing Sheet 15, including Fig. 15, with the attached Replacement Sheet, including amended Fig. 15.

For the Examiner's convenience, changes made to Fig. 1, Fig. 2, Fig. 4, Fig. 5, and Fig. 15 are noted in red on the attached Annotated Sheets.

REMARKS

Claims 1-62 were presented for examination and were pending in this application. In an Official Action dated August 9, 2005, claims 1-62 were rejected. Applicants thank Examiner for examination of the claims pending in this application and addresses Examiner's comments below.

Applicants herein amend claims 14, 19, 20, and 57-62, and cancels claims 38-56. These changes are believed not to introduce new matter, and their entry is respectfully requested. Reconsideration of the application in view of the above Amendments and the following Remarks is respectfully requested.

Amendments to the Specification

Applicants have amended portions of the specification as follows to correct typographical and grammatical errors noticed during prosecution.

Paragraphs [0039], [0045], [0067], [0078], [0082], [0083], [0085], [0088], [0090], [0100], [0105], and [0106] were amended to correct typographical and/or grammatical errors. Paragraph [0036] was amended to correct a typographical error with respect to identifying printer 100. Paragraph [0046] was amended to clarify the discussion of the ultrasonic pen capture device hardware module 365. Paragraph [0069] was amended to relocate existing reference numeral 215 for clarity. Paragraph [0073] was amended to correct a typographical error with reference to the UPnP protocol, to replace selected commas with semicolons to improve clarity, and to correct typographical errors with respect to identifying master task interface 616. Paragraph [0075] was amended to insert semicolons to improve clarity, and to remove the reference to Figure 12, which was repeated, more properly with reference to Figure 13, in original paragraph [0076]. Original paragraph [0076] was deleted and relocated into paragraph [0077] to improve clarity. Paragraph

[0077] was amended to delete an extra reference numeral 1318, and to break a long sentence into several short sentences to improve clarity. Paragraph [0078] was additionally amended to relocate existing numerals 1404 and 1406 for clarity. Paragraph [0083] was additionally amended to relocate reference numeral 1504 for clarity, to correct typographical errors in identifying UI listener 1554, and to include reference numeral 1506, which was originally present in Fig. 15. Various amendments were made to paragraph [0084] to correct typographical and/or grammatical errors, to identify the printer with reference numeral 1556, to identify the UI listener with reference numeral 1554, to relocate reference numeral 1510 for clarity, to correct typographical errors in identifying user 1550, to correct typographical errors in identifying application server 1558, to include reference numeral 1520, which was included in original Fig. 15, and to include reference numeral 1522, which was added to Fig. 15 by amendment.

Applicants respectfully submit that no new matter is introduced as a result of these amendments.

Amendments to the Drawings

In compliance with 37 C.F.R. § 1.121, Applicants submit and request acceptance of Replacement Sheets for Drawing Sheets 1, 2, 4, 5, and 15. Annotated Sheets showing amendments made to Fig. 1, Fig. 2, Fig. 4, Fig. 5, and Fig. 15 in red ink are also included for the Examiner's convenience.

Applicants have amended Fig. 1 to remove an extraneous portion of the lead line attached to reference numeral 125. Rather than touching the box surrounding Memory 130, the lead line is intended to reference the outer box surrounding Memory 130, Processor 135, and Modules 140. This amendment is supported by the specification in paragraph [0032]. Applicants have amended

Fig. 2 to include "Yes" and "No" labels on decision element "Refine Processing? 215." This amendment is supported by the specification in paragraph [0069]. Applicants have amended Fig. 4 to explicitly include a dashed outline and a reference numeral 115 to identify printed output system 115. This amendment is supported by Fig. 1 and paragraphs [0048]-[0050] of the specification. Applicants have amended Fig. 5 to explicitly include a dashed line and a reference numeral 120 to identify electronic output system 120. This amendment is supported by Fig. 1 and paragraphs [0051]-[0058] of the specification. Applicants have amended Fig. 15 to attach all lead lines to the proper boxes or arrows, to relocate reference numerals 1508 and 1514 to facilitate attaching their respective lead lines to the proper arrows, and to include reference numeral 1522 to identify a reply sent from the application server 1558 to the printer 1556. The addition of reference numeral 1522 is supported by paragraph [0084] of the specification.

Approval of the Proposed Drawing Changes is respectfully requested. It is also respectfully requested that the Examiner explicitly indicate his approval thereof in the next official communication.

Amendments to the Claims

The Applicants have amended claims 14, 19, 20, and 57-62 to correct errors noticed during prosecution. Claim 14 is amended to remove an extraneous reference to "the external source." Claims 19 and 20 are amended to clarify the limitation on "time-based media" and to correct a grammatical error. Claims 57-61 are amended to correct typographical errors in identifying the "external media processing system." Claim 62 is amended to correct typographical errors, thereby supplying antecedent basis to "the user interface" and to "a task." Applicants respectfully submit that no new matter is introduced as a result of these amendments.

Rejection Under 35 U.S.C. § 103(a)

In the 2nd paragraph of the Office Action, the Examiner rejected claims 1, 4-5, 11, 17, 19, 34-39, 45, 47, and 57, including independent claims 1 and 57, under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,633,723 to Sugiyama et al. ("Sugiyama") in view of U.S. Patent No. 5,386,510 to Jacobs ("Jacobs"). The other dependent claims were variously rejected, in 3rd – 14th paragraphs of the Office Action, based on combinations of Sugiyama, Jacobs, and one or more references such as Gropp, Korman, Hymel, Kleinrock, Stevens, McCarthy, Federspiel, Baron, Chino, Gerber, Kimura, Takemasa, Moriaga, and Steinberg. These rejections are respectfully traversed.

Independent Claims 1 and 57

Applicants respectfully assert that original independent claims 1 and 57 are patentably distinguishable over the combination of Sugiyama and Jacobs for two reasons. First, Applicants respectfully assert that there is no motivation to combine the references because they are from different fields of endeavor and are addressed to different problems. Second, even if the combination is proper, Applicants respectfully assert that the limitations of claims 1 and 57 are not disclosed or rendered obvious by the combination of Sugiyama and Jacobs, either alone or in combination.

Regarding the motivation to combine the references, Applicants respectfully assert that there is no motivation to combine the references because they are from different fields of endeavor. The Examiner stated, "Sugiyama and Jacobs are combinable because they are from the same field of endeavor, namely the control and processing of multi-media data." Applicants respectfully disagree. Jacobs deals only with printed media, including characters and images, that is not time-based, but is

instead static. The outlines of the characters and figures, in the form of vectors, are stored using a page description language such as Adobe Postscript®, see, e.g., col. 2, line 66, through col. 3, line 2. Hence, Jacobs is not in the field of "system[s or methods] for printing time-based media," as recited by Applicants' claims 1 and 57.

Additionally, Applicants respectfully assert that there is no motivation to combine the references because they are addressed to different problems. The system disclosed in Jacobs is addressed to increase the efficiency of processor use in converting image outline data to raster data (col. 2, lines 14-15, and col. 1, lines 10-14). Both the outline data and the raster data remain static, printed media. On the other hand, Applicants' system is directed to "a system for printing time-based media," which system "determin[es] an electronic representation of the time-based media," as recited in Applicants' claim 1. Applicants' claim 57 is directed to methods of printing time-based media in such systems. Thus, because Jacobs deals only with static media, Applicants respectfully submit that there is no motivation to combine Jacobs with Sugiyama.

Regarding the disclosure of Jacobs, Applicants respectfully assert that, even if the combination of Sugiyama and Jacobs is proper, several limitations of claims 1 and 57 are not disclosed or rendered obvious by the combination of Sugiyama and Jacobs, either alone or in combination. First, Applicants respectfully assert that Jacobs does not disclose "a media processing system ... wherein the media processing system resides at least in part on a multimedia printer and at least in part on an external media processing system," as recited by Applicants' independent claims 1 and 57. The Examiner acknowledged that "Sugiyama does not disclose expressly that said media processing system resides at least in part on an external media processing system," but stated, with reference to claim 1:

> Jacobs discloses a media processing system (figure 1 of Jacobs) which resides at least in part on a second media processing system (figure 1(12) of Jacobs) that is external to a first media processing system (figure 1(11) of Jacobs) (column 3, lines 3-11 of Jacobs) ...

A similar statement was made regarding Applicants' claim 57. Applicants agree that Figure 1 of Jacobs may be described as a (printed) media processing system; however, although the two parallel processors 11 and 12 of Jacobs are external to each other, they are internal to that media processing system (Figure 1 of Jacobs). Processing stations that are external to the (printed) media system of Figure 1 of Jacobs are those items connected to "external bus 14," such as "a word processor, a main-frame computer, a personal computer or the like." (col. 2, lines 60-63) Images from the external processing station are downloaded via external bus 14 for processing in the system of Figure 1 of Jacobs, which includes central unit 10 and the three parallel processors 11, 12, 13 (col. 3, lines 3-8). None of the outline to raster processing in Jacobs occurs on the external processing stations connected to external bus 14; all processing occurs on the internal parallel processors 11, 12, 13. Hence, Applicants assert that neither Jacobs nor Sugiyama, either alone or in combination, disclose or render obvious "a media processing system [that] resides at least in part on a multimedia printer and at least in part on an external media processing system," as recited by Applicants' independent claims 1 and 57.

Second, Applicants respectfully assert that Jacobs does not disclose "the multimedia printer including a housing for supporting an interface for transferring time-based media between the external media processing system and the printer," as recited by Applicants' independent claim 1. The Examiner acknowledged that "Sugiyama does not disclose expressly ... that said housing supports an interface for transferring said time-based media data between the external media processing system and the printer," but stated, with reference to claim 1:

> Jacobs discloses ... a housing (the overall physical construction of the system of figure 1 of Jacobs) for supporting an interface (figure 1(21) of Jacobs) for transferring media data between the external (second) media processing system and the first media processing system (column 3, lines 7-11 of Jacobs) ...

Applicants respectfully disagree with this characterization of Jacobs. As discussed above, both parallel processors 11 and 12 are internal to the (printed) media processing system of Figure 1 of Jacobs, and the communication units 21, 22 are internal to the parallel processors 11, 12. Any "housing" in Jacobs would have to surround all of Figure 1, except for the external bus 14. Any "interface" for transferring media to or from any external processing systems would have to be located at the external bus 14, not at communication units 21, 22. Jacobs, however, does not disclose or render obvious such a housing or interface. Additionally, although communication unit 21 transfers static media between processors 11, 12, as discussed above, Jacobs does not disclose "transferring time-based media," as required by Applicants' claim 1. Hence, Applicants assert that neither Jacobs nor Sugiyama, either alone or in combination, disclose or render obvious "the multimedia printer including a housing for supporting an interface for transferring time-based media between the external media processing system and the printer," as recited by Applicants' independent claim 1.

Third, Applicants respectfully assert that Jacobs does not disclose "a resource allocation module for determining processing allocation for at least one task among the printer and the external media processing system," as recited by Applicants' independent claim 1, and similarly recited by Applicants' independent claim 57. The Examiner acknowledged that "Sugiyama does not disclose expressly ... a resource allocation module for determining processing allocation for at least one task among the printer and the external media processing system ...," but stated; with reference to claim 1:

> Jacobs discloses ... a resource allocation module (figure 1(10) and column 3, lines 5-11 of Jacobs) for determining processing allocation for at least one task (column 4, lines 1-10 of Jacobs) among the first media processing system and the external (second) media processing system (column 3, lines 12-24 and column 4, lines 15-21 of Jacobs ...

Similar statements regarding determining processing allocation were made regarding Applicants' claim 57. Applicants respectfully disagree with this characterization of Jacobs and respectfully submit that the identified "central unit 10" is not a control unit, i.e., it is not a "resource allocation module," nor does it "determin[e] processing allocation," as required by Applicants' claims 1 and 57. ALU 24 of processor 11 can tell central unit 10 that it is too busy to process the order (column 4, lines 1-4). ALU 24, however, does not communicate directly with central unit 10, but only indirectly through communication channel 20, which first passes through all of the remaining parallel processors (Figure 1 of Jacobs). Each succeeding parallel processor decides for itself whether or not to process the order; the processing is not allocated by the central unit 10 at all (column 4, lines 4-10, and column 2, lines 33-37). Hence, Applicants assert that neither Jacobs nor Sugiyama, either alone or in combination, disclose or render obvious "a resource allocation module for determining processing allocation for at least one task among the printer and the external media processing system," as recited by Applicants' independent claim 1 and similarly recited by Applicants' independent claim 57.

Fourth, Applicants respectfully assert that Jacobs does not disclose "a user interface for receiving user input indicating selection of one or more media processing resources from among resources of the printer and an external system," as recited by Applicants' independent claim 1, and similarly recited by Applicants' independent claim 57. The Examiner acknowledged that "Sugiyama does not disclose expressly ... that said media processing resources selected via said user interface are selected from among resources of the printer and an external system," but stated,

with reference to claim 1, "Jacobs discloses ... selecting among resources of the first and second processors (column 4, lines 1-9 of Jacobs) ..." A similar statement was made regarding Applicants' claim 57. Applicants respectfully submit that "selecting among resources" cannot be taken in isolation. Neither Sugiyama nor Jacobs have a user interface to allow a user to select among the available resources. In Sugiyama, the user interface controls the video printer, but no external media processing system is disclosed, much less controlled. In Jacobs, each processor decides for itself to process an incoming order (column 4, lines 4-10); no user interface is disclosed or rendered obvious at all. Hence, Applicants assert that neither Jacobs nor Sugiyama, either alone or in combination, disclose or render obvious "a user interface for receiving user input indicating selection of one or more media processing resources from among resources of the printer and an external system," as recited by Applicants' independent claim 1 and similarly recited by Applicants' independent claim 57.

For all of the above reasons, Applicants respectfully assert that independent claims 1 and 57 are patentable over Sugiyama and Jacobs, both alone and in combination, and that the combination is improper in any case. Therefore, Applicants respectfully request that Examiner reconsider and withdraw the rejection of independent claims 1 and 57.

Dependent Claims 2-56 and 58-62

Claims 38-56 are canceled. As claims 2-37 are dependent on claim 1, and claims 58-62 are dependent on claim 57, all arguments advanced above with respect to claims 1 and 57 also apply to claims 2-37 and 58-62, respectively. Thus, Applicants respectfully assert that claims 2-37 and 58-62 are also patentable over Sugiyama and Jacobs, both alone and in combination, and that the combination is improper in any case. Applicants also submit that the features of independent claims

1 and 57 attributed by the Examiner to Jacobs are likewise not disclosed or rendered obvious by any of the art of record, such as Gropp, Korman, Hymel, Kleinrock, Stevens, McCarthy, Federspiel, Baron, Chino, Gerber, Kimura, Takemasa, Moriaga, or Steinberg. Therefore, Applicants respectfully request that the Examiner reconsider and withdraw the rejections of the dependent claims as well.

CONCLUSION

In sum, Applicants respectfully submit that claims 1-37 and 57-62, as presented herein, are patentably distinguishable over all of the art of record. Therefore, Applicants request reconsideration of the basis for the rejections to these claims and request allowance of them.

In addition, Applicants respectfully invite Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully submitted,
PETER E. HART, ET AL.

Dated: 11/9/05

By: _____

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Annotated Sheet

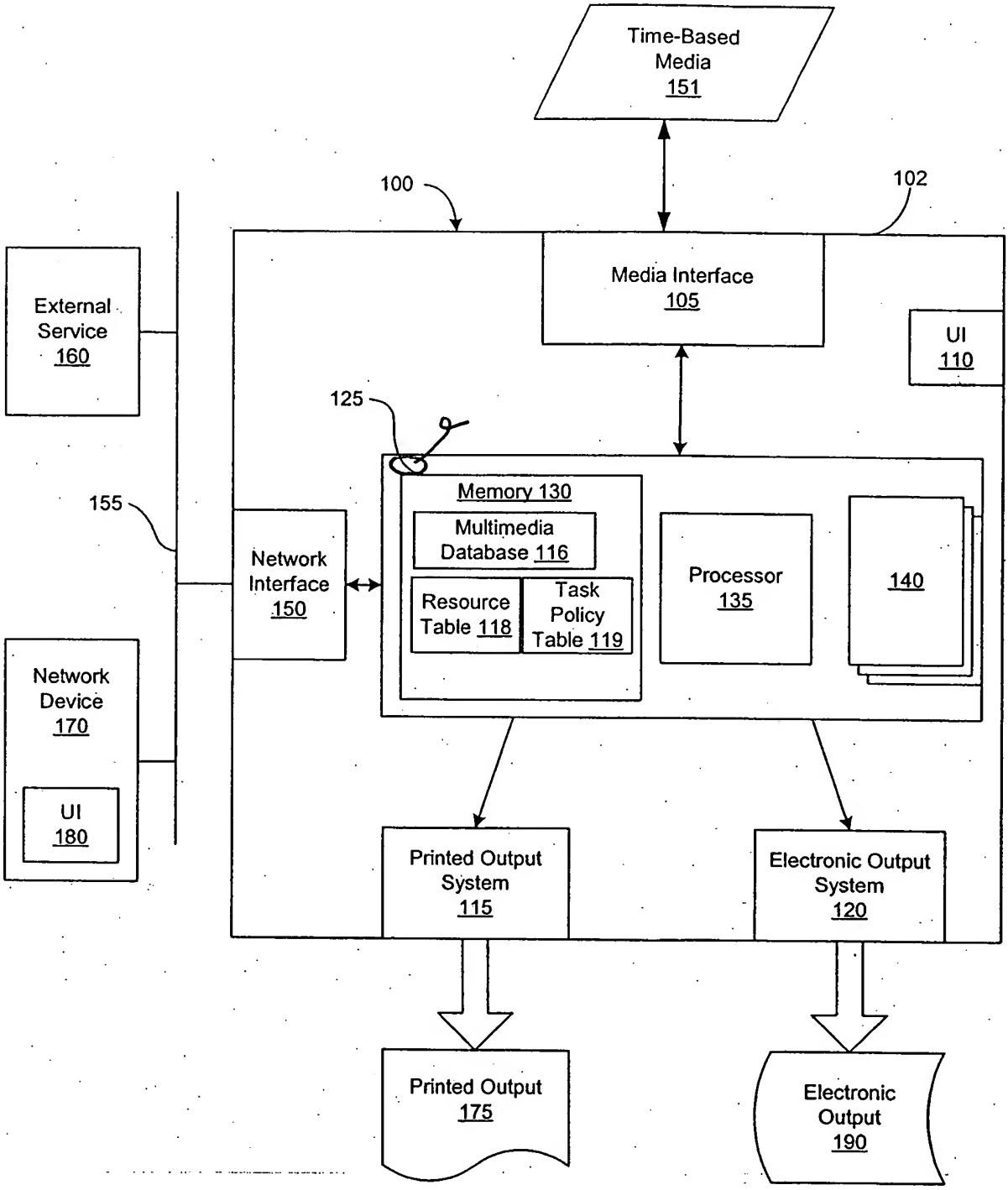

FIG. 1

Annotated Sheet

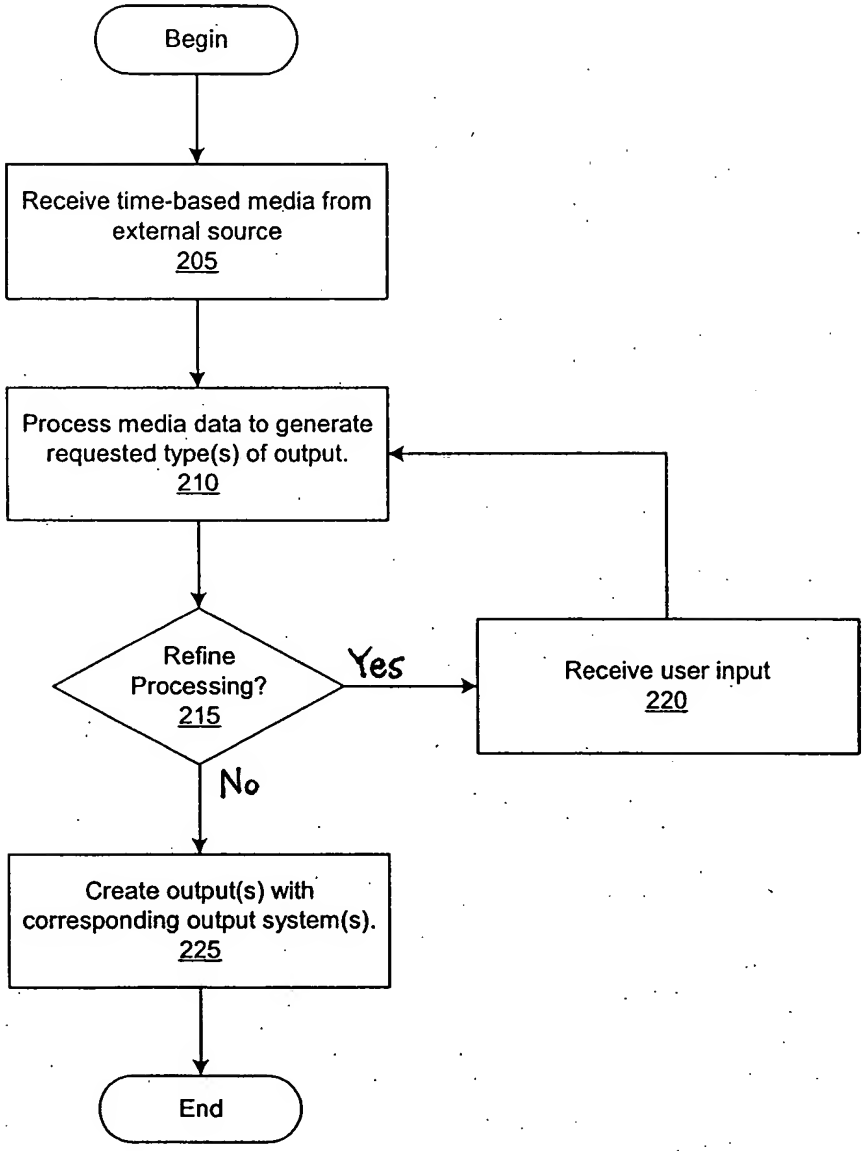

FIG. 2

Annotated Sheet

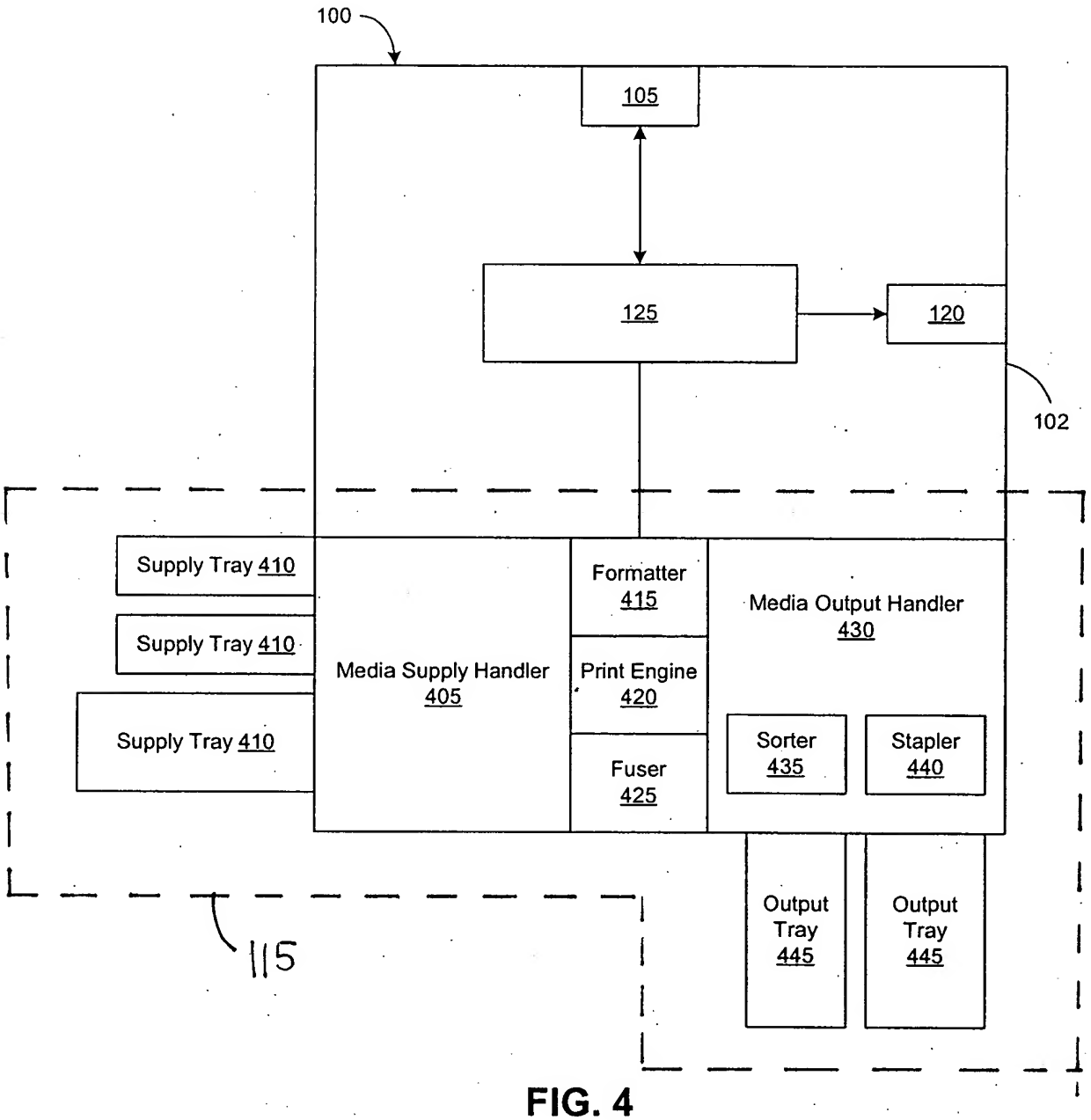

FIG. 4

Annotated Sheet

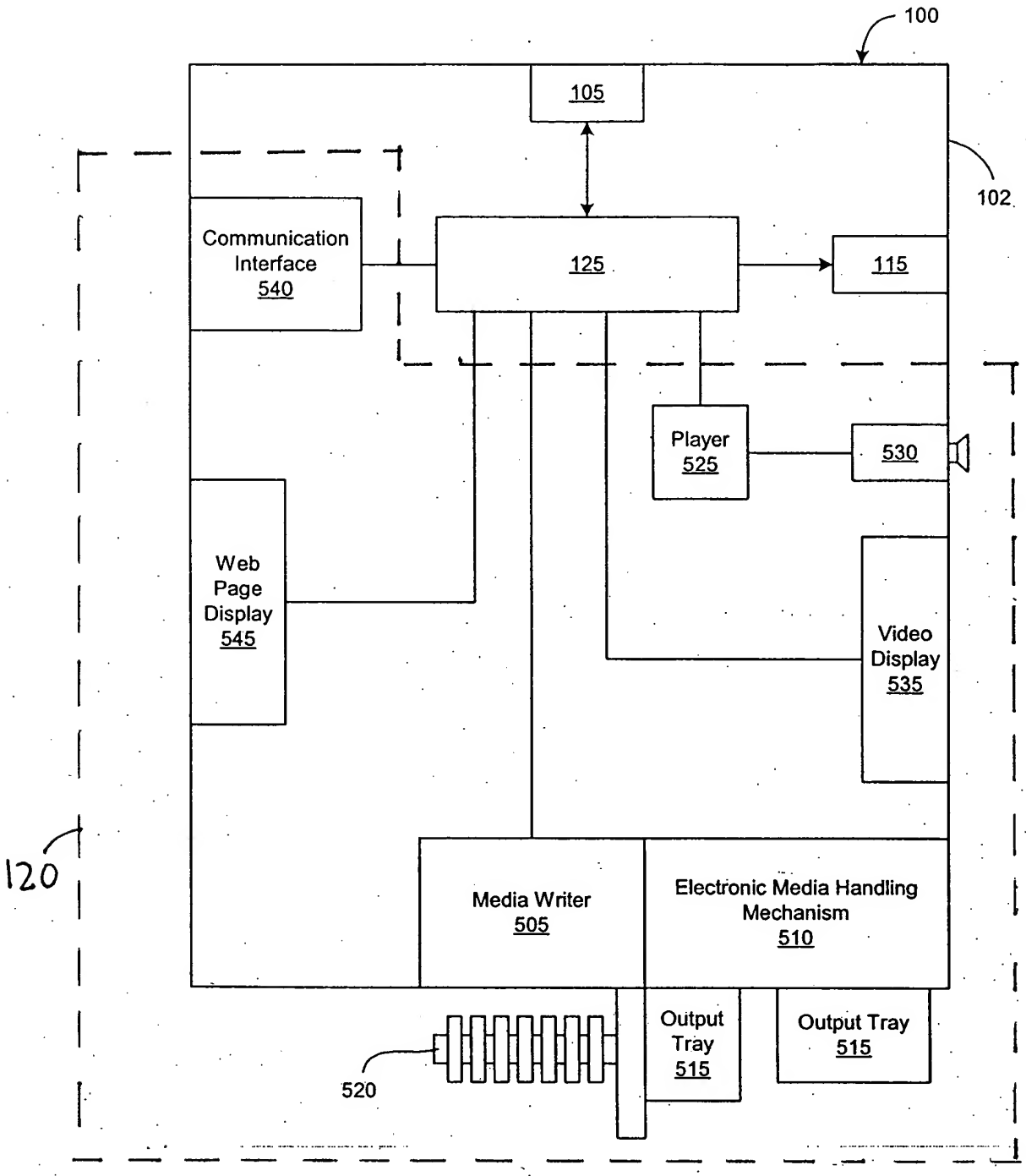

FIG. 5

Annotated Sheet

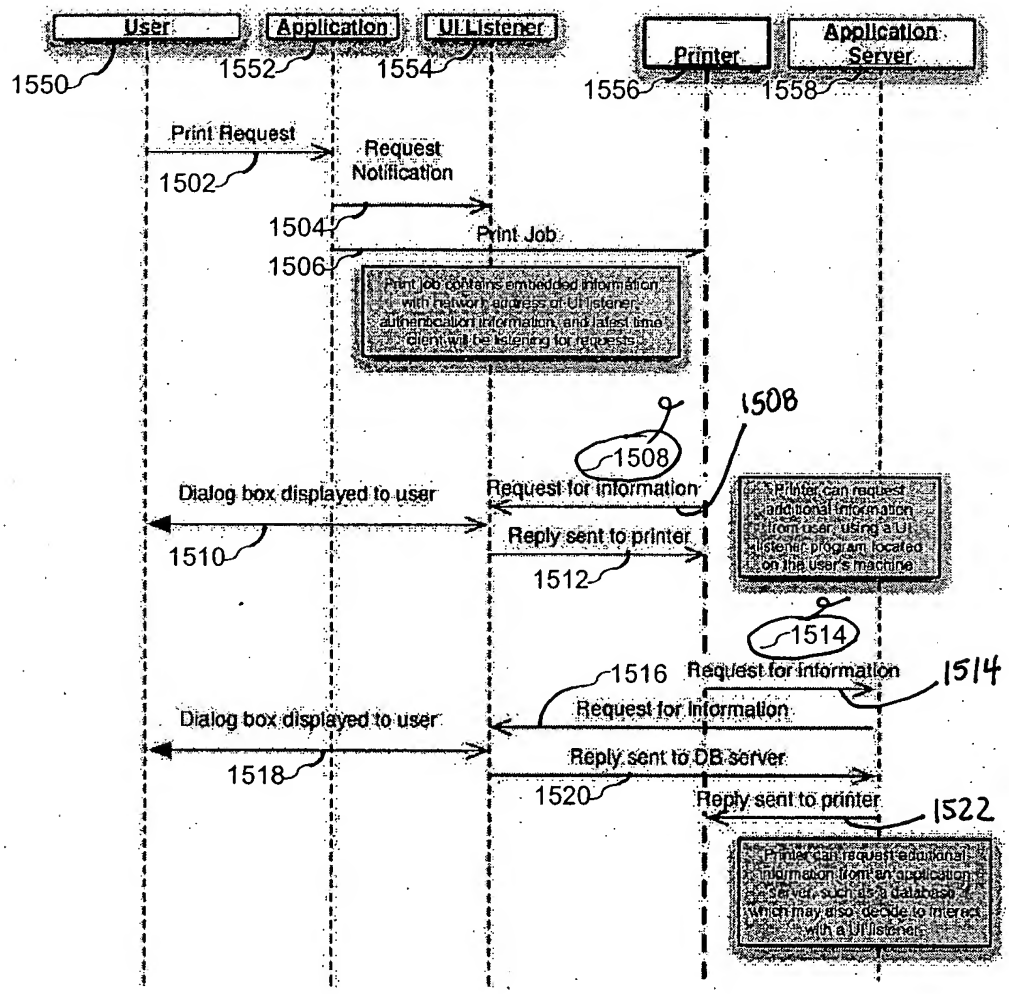

Fig. 15